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17 Ultimate Fighting Championship and UFC

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19 UNITED STATES DISTRICT COURT
20 DISTRICT OF NEVADA

21 Cung Le, Nathan Quarry, Jon Fitch, Brandon
22 Vera, Luis Javier Vazquez, and Kyle
23 Kingsbury on behalf of themselves and all
24 others similarly situated,

25 Plaintiffs,
v.

26 Zuffa, LLC, d/b/a Ultimate Fighting
27 Championship and UFC,

28 Defendant.

Case No.: 2:15-cv-01045-RFB-(PAL)

**DECLARATION OF NICHOLAS
A. WIDNELL IN SUPPORT OF
ZUFFA, LLC'S UNOPPOSED
MOTION TO SEAL ZUFFA'S
AUGUST 19, 2019 LETTERS TO
THE COURT**

1 I, Nicholas A. Widnell, declare as follows:

2 1. I am a member in good standing of the bar of the District of Columbia. I am admitted *pro*
3 *hac vice* to practice before this Court. I am a Partner in the law firm Boies Schiller Flexner LLP,
4 counsel for Zuffa, LLC (“Zuffa”) in the above captioned action in the U.S. District Court for the
5 District of Nevada, *Le et al. v. Zuffa, LLC*, No. 2:15-cv-01045-RFL-BNW.

6 2. I make this declaration in support of the Zuffa, LLC’s Unopposed Motion to Seal Zuffa’s
7 August 19, 2019 Letter to the Court.

8 3. Based on my review of the files, records, and communications in this case, I have personal
9 knowledge of the facts set forth in this Declaration, and if called to testify, could and would
10 testify competently to those facts under oath.

11 4. On August 19, 2019, counsel for Zuffa contacted counsel for Plaintiffs and advised them
12 that Zuffa intended to seek to seal its August 19, 2019 Letters to the Court because they contained
13 the highly sensitive medical information of two evidentiary hearing witnesses. In response,
14 Plaintiffs stated that they do not oppose this motion.

15 I declare under penalty of perjury under the laws of the United States of America that the
16 foregoing facts are true and correct. Executed this 19th day of August, 2019 in Washington, D.C.

17 By: /s/ Nicholas A. Widnell
18 Nicholas A. Widnell